

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON**

IN RE: PREMIER BLUE CROSS  
CUSTOMER DATA SECURITY BREACH  
LITIGATION

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Case No. 3:15-md-2633-SI

**PRETRIAL ORDER NO. 2**

This Document Relates to All Actions.

**Michael H. Simon, District Judge.**

On August 7, 2015, the Court held the Initial Case Management Conference in this action. The following matters were discussed and resolved:

1. The Court appoints the following persons and law firms as Interim Lead Plaintiffs' Counsel and Interim Liaison Plaintiffs' Counsel, pursuant to Fed. R. Civ. P. 23(g)(3), for a one-year renewable term:

Christopher I. Brain, *cbrain@tousley.com*  
Kim D. Stephens, *kstephens@tousley.com*  
Chase C. Alvord, *calvord@tousley.com*  
Jason T. Dennett, *jdennett@tousley.com*  
TOUSLEY BRAIN STEPHENS PLLC  
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Telephone: (206) 682-5600  
*Interim Lead Plaintiffs' Counsel*

Keith S. Dubanevich, *kdubanevich@stollberne.com*  
Steve D. Larson, *slarson@stollberne.com*  
Mark A. Friel, *mfriel@stollberne.com*  
STOLL STOLL BERNE LOKTING & SHLACHTER P.C.  
209 S.W. Oak Street  
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Telephone: (503) 227-1600  
*Interim Liaison Plaintiffs' Counsel*

2. The Court notes that the following persons and law firms have appeared as counsel for Defendant Premera Blue Cross:

Daniel R. Warren, *dwarren@bakerlaw.com*  
BAKER & HOSTETLER LLP  
1900 East Ninth Street, Suite 3200  
Cleveland, OH 44114  
Telephone: (216) 620-0200

Paul G. Karlsgodt, *pkarlsgodt@bakerlaw.com*  
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Darin M. Sands, *SandsD@LanePowell.com*  
LANE POWELL PC  
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3. Not later than August 21, 2015, interim lead and liaison Plaintiffs' counsel and Defendant's counsel shall, after conferring, file a joint proposed case management schedule. The parties shall indicate where they agree and where they disagree, and may provide brief argument explaining the nature of and reasons for any disagreements.

4. Not later than October 6, 2015, Plaintiffs shall file a Consolidated Master Complaint.

5. Also not later than October 6, 2015, interim lead and liaison Plaintiffs' counsel shall file their proposal for leadership structure and responsibilities. This document shall include

Plaintiffs' proposed division of responsibilities among lead and liaison counsel, as well  
Plaintiffs' additional recommendations for a Plaintiffs' steering committee, if any, including both  
the membership and responsibilities of such a steering committee.

6. The Court directs the Clerk of the Court to send a copy of this Order to the Clerk  
of the Judicial Panel on Multidistrict Litigation.

**IT IS SO ORDERED.**

DATED this 7th day of August, 2015.

/s/ Michael H. Simon  
Michael H. Simon  
United States District Judge